

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AARON ABADI,

Plaintiff

v.

AMERICAN AIRLINES, INC., et al.,

Defendants.

)
)
)
)
)
)
)
)
)
)

Case No. 1:23-cv-04033-LJL

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Declaration of David Anderman, and the exhibits thereto, dated February 26, 2024, and upon all prior pleadings and proceedings in this action, Defendant Southern Airways Express, LLC (d/b/a Mokulele Airlines), by and through their attorneys, Stinson LLP, shall move this court at the United States District Court for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, NY 10007, before the Honorable Lewis J. Liman, United States District Judge, on a date and time to be set by the Court, for an order dismissing each of Plaintiff's 31 separate counts against them in the Complaint, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state claims upon which relief can be granted, and for any other relief deemed appropriate by the Court.

PLEASE TAKE FURTHER NOTICE that Plaintiffs will be required to respond pursuant to a briefing schedule to be set by the Court (or, in the absence of a specific order, by Local Rule 6.1(b)).

Dated: New York, New York
February 26, 2024

Respectfully submitted,

STINSON LLP

By: Kieran M. Corcoran (KC4935)
100 Wall Street, Suite 201
New York, New York 10005
Tel: (646) 883-7480
Email: kieran.corcoran@stinson.com

Paul Lackey (PL7651)
2200 Ross Avenue, Suite 2900
Dallas, TX 75201
Tel: (214) 560-2206
Email: paul.lackey@stinson.com

M. Roy Goldberg (*Admitted Pro Hac Vice*)
1775 Pennsylvania Avenue, N.W., Suite 800
Washington, D.C. 20006
Tel: (202) 728-3005
Email: roy.goldberg@stinson.com

*Attorneys for Southern Airways Express,
LLC (d/b/a Mokulele Airlines)*